



CITY OF PHILADELPHIA

H A N D D E L I V E R

LAW DEPARTMENT
ENFORCEMENT DIVISION
1101 Market Street, 10th Floor
Philadelphia, Pa. 19107-2007

April 6, 1989

Michael J. Stack, Jr., Esquire
STACK & STACK
1600 Locust Street
Philadelphia, PA 19103

re: CEASE OPERATIONS ORDER
E Z CHEMICAL COMPANY
48-60 Laurel Street

Dear Mr. Stack:

This will confirm our telephone conversations yesterday regarding the Order to Cease Operations issued against E Z Chemical by the City of Philadelphia, Department of Licenses and Inspections. As we discussed, this Order supplements the previous Cease Operations Order issued in August, 1988.

By the terms of the current Order, your clients, E Z Chemical Company and Edward Zakrocki, are ordered not to allow the movement of any materials onto or off of the subject premises, 48-60 Laurel Street. Mr. Zakrocki is directed to obtain the services of a qualified expert who will immediately create a complete inventory and analysis of all materials currently on the premises and provide same to the City. In addition, this consultant shall provide the City with a proposal for the clean-up of the site and the proper storage and movement or removal of hazardous substances.

Based on observations by members of the Fire Department's Hazardous Materials Unit of a laboratory containing many samples of unidentified chemicals on the second floor of the office building, the City has also ordered your client to keep all persons out of the second floor until you can provide us with a proper analysis of the materials found there. In addition, in the interest of safety, your client was directed to vacate the entire building as of the close of business yesterday, April 5, 1989.

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Finally, in light of the volatile situation at this site, the City is requesting that your client provide security for the premises on a 24-hour a day basis. It is my understanding that the Philadelphia Police Department will also provide additional surveillance of the site.

It is further my understanding that representatives of the United States Department of Environmental Protection Agency ("E.P.A.") will also be evaluating the subject premises. The City will, of course, allow your client to enter the building and to move or remove materials at the direction of the E.P.A., should that be necessary.

It is my expectation that, in the near future, I will be filing a Complaint in Equity to secure Court oversight for compliance with the Cease Operations Order and all other outstanding violations of the Code.

If you wish to discuss this matter further, please do not hesitate to contact me.

Very truly yours,

Flora Barth Wolf

FLORA BARTH WOLF
Divisional Deputy City Solicitor
592-5340

FBW/c

cc: Robert Hoyt, Chief, Fire C&I, Licenses and Inspections
Chief James Meskill, Fire Department
Chief Ted Batemen, Fire Department

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